

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

GILBERTO MARTINEZ GOMEZ
LAURA MARGARITA SERRANO SANTANA

DEBTORS

CASE NO 12-03113/MCF

CHAPTER 13

DEBTORS' REPLY TO TRUSTEE'S MOTION TO DISMISS, DOCKET NO. 58

TO THE HONORABLE COURT:

NOW COME, GILBERTO MARTINEZ GOMEZ and LAURA MARGARITA SERRANO SANTANA, debtors in the above captioned case through the undersigned attorney, and very respectfully state and pray as follows:

1. On August 19, 2013 the Chapter 13 Trustee filed a *Motion to Dismiss*, docket 58, alleging that the debtors have failed to make payments called for in the confirmed Plan dated August 30, 2012.

2. The debtors respectfully submit that they have filed a post-confirmation modified Plan, docket no. 55, dated August 13, 2013, which Plan cures the arrears owed to the Trustee.

WHEREFORE debtors respectfully request the Court deny the *Motion to Dismiss*, docket 58, filed by Trustee in the above captioned case.

I CERTIFY that on this same date a copy of this notice was sent by the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee, José R. Carrion, Esq.; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants and debtors, Gilberto Martinez Gomez and Laura Margarita Serrano Santana, in the above captioned case.

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RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico this 6th day of September, 2013.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USCD-PR #203614
PO BOX 193677
SAN JUAN PR 00919-3677
TEL (787)744-7699
FAX (787)746-5294
EMAIL rfigueroa@rfclawpr.com